

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WEIHARIK GARCIA, individually and on behalf  
of all others similarly situated,

Civil Action No. 2:24-cv-01305

Plaintiff,

v.

SOUTH SHORE HYUNDAI, LLC

Defendant.

**UNCONTESTED MOTION TO EXTEND TIME TO MOVE OR OTHERWISE  
RESPOND TO PLAINTIFFS' COMPLAINT**

In accordance with Federal Rule of Civil Procedure 6(b)(1)(A), Defendant, JS Hyundai of Valley Stream, LLC d/b/a South Shore Hyundai, improperly pled as South Shore Hyundai, LLC (hereinafter "South Shore"), by and through its undersigned counsel, hereby moves for an Order extending South Shore's time to move or otherwise respond to Plaintiffs' Complaint until June 21, 2024. In support of this Motion, South Shore avers the following:

1. On or about March 27, 2024, Plaintiffs filed a Complaint against South Shore in the United States District Court for the Eastern District of Pennsylvania, and the matter was assigned Civil Action No. 2-24-cv-01305.
2. On April 22, 2024, South Shore contacted the law firm of McAngus Goudelock & Courie, LLC ("MGC") about legal representation in this matter.
3. Thereafter, as a professional courtesy, MGC contacted Plaintiffs' counsel on April 22, 2024, requesting that Plaintiffs consent to extend South Shore's time to move or otherwise respond to Plaintiffs' Complaint until May 22, 2024.
4. Plaintiffs consented to the first extension of time until May 22, 2024.

5. In the interim, South Shore retained MGC as its legal counsel in this matter.
6. On May 8, 2024, MGC contacted Plaintiffs' counsel requesting a second extension of time for South Shore to move or otherwise respond to Plaintiffs' Complaint.
7. Plaintiffs took no position on South Shore's request for a second extension of time.
8. Due to the recent appearance of South Shore's counsel and the complex issues involved in this dispute, good cause exists to extend the time for South Shore to move or otherwise respond to Plaintiffs' Complaint.

**WHEREFORE**, South Shore respectfully requests that this Honorable Court extend the time for South Shore to move or otherwise respond to Plaintiffs' Complaint until June 21, 2024.

Dated: May 14, 2024



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Eric A. Fitzgerald, Esq.  
Joseph G. Grady, Esq.  
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JS Hyundai of Valley Stream, LLC d/b/a South  
Shore Hyundai, improperly pled as South Shore  
Hyundai, LLC*

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**CERTIFICATE OF COUNSEL**

I, Joseph G. Grady, Esquire, hereby certify that I sought the position of Andrew Roman Perrong, Esquire, counsel for Plaintiffs, on this Motion pursuant to Local Rule 7.1(b). Mr. Perrong took no position on this Motion.



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Eric A. Fitzgerald, Esq.  
Joseph G. Grady, Esq.

Date: May 14, 2024

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**CERTIFICATE OF SERVICE**

I, Eric. A. Fitzgerald, Esquire, hereby certify that a true and correct copy of the foregoing Uncontested Motion for Extension of Time was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing by ECF on all counsel of record on this 14th day of May 2024.



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Eric A. Fitzgerald, Esq.  
Joseph G. Grady, Esq.

Date: May 14, 2024